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RECEIVED

JUL 8 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

July 8, 1999

Magalie Roman Salas, Secretary
Federal Communications Commission
445 Twelfth Street, SW Room TWB-204
Washington, D.C. 20554

Re: Ex parte, CC Docket No. 96-98, The Local Competition
Provisions in the Telecommunications Act of 1996

Dear Ms. Salas:

Today, a copy of the enclosed letter was delivered to Carol Matthey, Jake Jennings, Audrey Wright, William Agee, John Stanley, and Jessica Rosenworcel of the Common Carrier Bureau's Policy and Program Planning Division. Please include a copy of this notice in the record of the above-captioned proceeding.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

A handwritten signature in dark ink, appearing to read "F. Simone".

Attachment

cc: Ms. Carol Matthey
Mr. Jake Jennings
Ms. Audrey Wright

Mr. William Agee
Mr. John Stanley
Ms. Jessica Rosenworcel

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List A B C D E



Rian J. Wren
Regional President - Southwest States
Local Services Organization

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July 7, 1999

Ms. Sandy Kinney
President – Industry Markets
SBC Telecommunications, Inc.
One Bell Plaza, Suite 5705
Dallas, TX 75202

Dear Sandy,

I received your July 1, 1999, letter. Frankly, I am alarmed that your letter contradicts information relayed to AT&T by the SWBT account team regarding the service outage situation experienced by AT&T's customers, attempts to minimize the significance of the problem, and fails to respond to the direct questions raised in my June 28, 1999 letter.

Your letter states that the loss of outbound dialing capabilities occurred because SWBT's implementation of its customized routing capabilities did not work "as intended". It is AT&T's understanding now that prior to AT&T issuing Resale to UNE migration orders, SWBT recognized that its AIN platform did not work as intended and failed to communicate this information to AT&T. Following the loss of service experienced by its customers, AT&T has been advised that SWBT's AIN design does not allow SWBT's electronic processes to coordinate the "D" (disconnect) and "N" (new) service orders which are generated internally by SWBT upon receipt of a migration Local Service Request. Apparently, SWBT has implemented a **manual** process to facilitate the coordination of the D and N orders and to manually establish the AIN triggers required to route all calls originated by an end user customer. It was the manual process implemented by SWBT that failed and resulted in loss of service to our customers. As we currently understand it, SWBT is planning to implement a modified manual process involving a different work center to perform this coordination of internal service order function until an electronic fix is available and implemented. As stated in your letter, the electronic fix is not scheduled until mid-August. Could you please be more specific in identifying the actual implementation date? As you are well aware, our past experience with SWBT's implementation of new software raises concerns about potential problems

with order processing. What plans are in place for internal and intercarrier testing of the new software prior to its introduction?

Contrary to statements contained in your letter, the loss of service experienced by 24 of 28 AT&T customers apparently is **not unique to AT&T's Resale to UNE migration orders**. We have been advised that this problem (loss of outbound calling capability) was encountered by another CLEC while **migrating SWBT retail customers to the CLEC**. We have also been advised by your team that the manual process that resulted in the loss of dialing capabilities spans **all** migration order types, i.e., SWBT retail to CLEC migrations and any/all CLEC to CLEC migrations.

Again, contrary to statements contained in your letter, the provisioning of resale to UNE orders was included within the scope of the Texas PUC OSS testing. The 65 Resale to UNE migration orders (26% of the migration and new orders) included within the TX PUC OSS functionality test apparently were managed at SWBT's end in a manner that did not result in customer service interruptions and that camouflaged the "D" and "N" service order coordination problem. SWBT represented that the process invoked for the TX PUC OSS test would be representative of the commercial process to migrate a customer from Resale to UNE. The test plan itself represents that the distribution and weighting of order types included within the functionality testing is intended to mirror anticipated commercial activity. With the decision having been made to use the resale to UNE scenario to build more than one quarter of the OSS migration and new order test cases, I am troubled that your letter attempts to characterize the loss of service issue as a problem with limited impact. The conversion of customers initially migrated on a resale basis obviously will not be an anomaly now or in the future. Moreover, the contradictory information AT&T is receiving from SWBT as to whether the problem will arise with the provisioning of all migration orders raises concerns that extend beyond AT&T's transition of its embedded base of resale customers.

Your letter also mis-characterizes the facts surrounding AT&T's willingness to coordinate its conversion efforts with SWBT. We discussed the possibilities of creating special processes to migrate the Resale embedded base to UNE and concluded that it would be more appropriate to follow standard ordering processes to ensure that the service requests were processed through all of the appropriate systems, processes, and databases. Your letter also overlooks the fact that SWBT intended to impose individual service order charges as well as additional special processing charges despite the fact that individual orders would not be generated, making the proposed end run around standard processes even less attractive. More critically, at no point was AT&T advised that adhering to SWBT's service order submission processes for transitioning customers from resale to UNE would result in service outages. Why were we not advised of the risk?

Sandy, your letter does not respond to my request for a detailed audit of SWBT's systems and processes in order to identify all electronic versus manual processing capabilities. This is extremely important for me to evaluate the risks associated with

moving forward with AT&T's UNE market entry plans. The fact that the customer outage problem is connected to SWBT's AIN platform design and implementation, which was never represented by SWBT to include any manual processing, is alarming in and of itself and I believe substantiates the need for a detailed design, system and process review.


Additionally, we are continuing to experience significant delays with SWBT's downstream systems. Specifically, AT&T is still not able to access customer records to initiate repair and maintenance processes following service order completion. We have provided a number of examples to the account team and have been working with Randy Gurley for some time now but cannot seem to resolve the timing issues. The time lag before accounts can be accessed electronically through trouble administration has ranged from more than 3 to more than 50 days from the time of service order completion. It is critical that AT&T be able to electronically perform mechanized loop tests and be able to issue trouble tickets when customers experience problems such as those typically encountered at the time of initial service establishment. Our concern about the inability to access accounts for **new** customers is compounded by the lack of satisfactory problem resolution through the issuance of trouble tickets for those service outages recently experienced in the conversion of our **existing** resale customers. We were left with no choice but to refer the problem to the account team, a step that should not have been necessary if maintenance processes had been functioning appropriately.

With respect to the technician issues raised in my prior letter, it is my understanding that SWBT employees will be attending training over the next several weeks relative to interfacing with CLEC customers and representing themselves as working on behalf of the CLEC as opposed to SWBT. Would you please confirm that this level of training will include the contact process that we have agreed to whereby end-user customer contact is initiated by AT&T for its customers and not by SWBT?

Based on your representation that SWBT is prepared to handle AT&T's order volumes, we will proceed cautiously with additional testing and processing until we hear from you regarding defined solutions and until contradictions regarding the scope of the problem are resolved. We will evaluate the risks associated with moving forward with AT&T's market plan execution based on the results of the audit that we have requested as well as the results of additional testing.

Because the questions raised in this letter have already been raised to you and given the market entry schedule we are trying to adhere to, I would request a response as quickly as possible but not later than July 9.

Sincerely,



Rian J. Wren

Sandy Kinney
President-
Industry Markets

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Phone 214 464-5111
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July 1, 1999

VIA FACSIMILE

Mr. Rian Wren
Regional President - Southwest
AT&T
5501 LBJ Freeway
Suite 800
Dallas, TX 75240

Dear Rian:

First of all let me apologize for the service disruption experienced by you and the other customers of AT&T. Customer service is extremely important to SWBT and we treat all service matters with a great deal of care. As you know, we offered several months ago to work with you to move to unbundled network elements the embedded base of resale customers that AT&T has built over the last 3 years in Texas. Unfortunately, AT&T has not sought to work with SWBT to move those customers as a coordinated project.

The situations you have experienced during your Service Readiness Testing (SRT) illustrate the very reasons our companies cooperatively pursue and work through tests such as these. Joint testing allows our companies to identify issues and resolve them collaboratively. Our teams are holding weekly calls to ensure that these issues receive the proper attention. We are supportive of the testing process and will continue to work with AT&T to resolve issues. The key to progress will be for our teams to continue working together to address issues as they arise, using the processes that we have jointly developed in other arenas.

The specific situation that prompted your phone call to me has been investigated. The service disruption experienced was related to the provisioning of SWBT's AIN platform, which is associated with the customized routing feature of AT&T's resale services. A process was in place to address AT&T's specific situation of

Mr. Rian Wren

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moving resold accounts with customized routing to UNE; however, the process did not work as intended. An improved interim process has been implemented leading up to our deployment of a long-term solution in mid-August.

The specific order type AT&T submitted during this SRT is unique to AT&T. With AT&T's stated intention to abandon the resale market, the scope of this type of order will in all probability be limited to AT&T's project of moving its embedded base of resold customers. It was probably in recognition of the uniqueness of this order type that neither AT&T nor anyone else in the industry identified this as a scenario that required provisioning in the functionality portion of the OSS test. In any event, the problems you experienced were not a result of our OSS interface.

Despite the uniqueness of your embedded base of resale customers, we reiterate our offer to help coordinate this project of moving your existing resale customers to unbundled network elements. In the event you instead desire to utilize this unique order type as part of a coordinated test prior to the next phase of your service readiness assessment, we will be glad to provide the necessary coordination on that as well. As you move forward with your market expansion plans, please do not hesitate to request our assistance when a project of this nature arises again.

I am fully confident that SWBT will continue to provide AT&T with a high level of customer service. Our commitment to this belief is backed by the myriad of performance measures and associated damage provisions currently in place, which were sought by AT&T and approved by the Commission. These measures will provide more than adequate information regarding our performance for AT&T to pursue its analysis and evaluation.

Rian, as you know, we have literally thousands of employees working with AT&T across a wide variety of fronts. It is inevitable that some failures, such as those you identified in your letter, will occur. We expect that you will inform us on a timely basis of any pattern of service problems that you see developing as they become apparent, so that we can promptly address any generic resolution to such service problems. In fixing every individual service outage as it was identified and promptly improving the processes to avoid these problems on both a short-term and long-term basis, I believe that we demonstrated our commitment to accommodating AT&T's market expansion plans.

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I encourage you to continue with your market expansion plans. We are ready to handle all of your commercial orders, including the 4,000 per day you mentioned in your letter.

Sincerely,

Sandy Kinney